

COHENMILSTEIN

MEMO ENDORSED

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May 10, 2017

VIA ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *Citizens for Responsibility and Ethics in Washington, et al. v. Trump*, Civil Action No. 1:17-cv-00458-RA

Dear Judge Abrams:

On April 19, 2017, this Court adopted the current schedule for briefing of the defendant's anticipated dispositive motion. This schedule was adopted in response to an amendment to the complaint, which added two new plaintiffs as well as a claim under the Domestic Emoluments Clause, U.S. Const. art. II, cl. 7, among other new allegations.

The plaintiffs now seek to amend the complaint again, solely to add one additional plaintiff. Under Federal Rule of Civil Procedure 15(a)(2), the plaintiffs may amend their complaint with the opposing party's written consent.

The defendant consents to the plaintiffs' request to amend the first amended complaint on the condition that the plaintiffs consent to an extension by one week of the date on which the defendant's dispositive motion is due. Accordingly, the parties respectfully request a one-week extension from June 2, 2017 to June 9, 2017 for the defendant to file his dispositive motion. The balance of the previous briefing schedule would remain in place. The revised briefing schedule would be as follows:

Defendant's Dispositive Motion will be due on June 9, 2017

Plaintiffs' Response to any Dispositive Motion will be due on July 14, 2017

Defendant's Reply would be due on August 11, 2017

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Respectfully submitted,

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**APPLICATION GRANTED
SO ORDERED.**

RONNIE ABRAMS, U.S.D.J.

5/11/11